

Exhibit G

Precilla Rexach

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

03-MDL-1570 (GBD)(SN)

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

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SUZZANNE ANDERSON, et al,

**AFFIDAVIT OF
PRECILLA REXACH**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF OKLAHOMA)

: SS.:

COUNTY OF ROGERS)

PRECILLA REXACH, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 18525 Bushyhead Road, Chelsea, Oklahoma 74016.
2. I am currently 51 years old, having been born on February 19, 1971.
3. I am the wife of Antolino Rexach, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My husband passed away from metastatic stomach cancer on September 27, 2014, at the age of 50. It has been medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. I had a great relationship with my husband, who was a loving and devoted family man. We loved to spend time together and do things as a family. We loved taking trips together and

going fishing near Claymore Lake. We valued family time more than anything, and my husband would fly out to Oklahoma on weekends to spend time with us when he had to stay behind in New York and work to provide for us. When he retired in October 2008 and rejoined us in Oklahoma, we had so much fun together and tried to spend as much time with each other as we could to make up for lost time.

6. On 9/11, my husband was working as a corrections officer at the Manhattan Court near the World Trade Center. We didn't hear from him for three days, which was one of the most agonizing periods of my life. We didn't know if he was dead or alive. When we did see my husband, he was covered in dust and debris and in shock since he was caught in the chaos near the World Trade Center. He stayed behind to help people and felt like it was his duty to do what he could.

7. Within a few months of 9/11, my husband got sick. He had trouble eating. He went to the bathroom so many times a day. He threw up. He lost a lot of weight. He told me it felt like his stomach was burning from the inside. He would scream in pain and say it was like being tortured. He threw up uncontrollably and lost so much weight that at one point they had to give him a feeding tube. He complained of chest pain. He went to the doctor on and off for over a decade – between 2002 and 2014 – trying to get answers on why he was ill and losing weight. He was finally diagnosed with stage IV metastatic stomach cancer in April 2014, at which point it had spread too far. He received aggressive chemotherapy and radiation from the Cancer Treatment Center in Tulsa, Oklahoma. He would shake uncontrollably from the chemotherapy. He was in so much pain and would cry and scream that it felt like his stomach was burning up. He declined rapidly after his diagnosis and died a few months later, in September 2014. It was heartbreaking that, by the time he finally got answers, it was too late to save him.

8. My husband's illness and death had a huge emotional impact on me and hit me hard. It was difficult to watch him in such pain and losing so much weight and the doctors not being able to find out what was wrong with him. It was hard to be strong for our kids and try to hide things from them. It was tough not knowing if my husband was going to survive and watching him suffer. I did my best to be strong for him and tell him that everything was going to be okay, but I knew that something was wrong, and I couldn't do anything to help him. It hurts every day that he is not here with us.

9. My husband's illness and death had a big financial impact on our family. I was working around the clock in hospital housekeeping so I could make money for our family and keep the insurance that we desperately needed so my husband could have coverage for his chemotherapy and radiation treatments and medication. I had to take time off from work to take care of my children and bring my husband to all his medical appointments, which was stressful and put a strain on me.

10. Losing my husband has been devastating and watching him suffer and decline was heartbreaking. He was so strong and such a great provider, but in the end, he got so weak and broken and was in so much pain. He has missed out on so many joyous times in our family and nothing can bring him back or the happy memories we once shared as a family.


PRECILLA REXACH

Sworn to before me this
13th day of July, 2022


Notary Public



Ashley Nicole Rodenheiser

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
SUZZANNE ANDERSON, et al.,

**AFFIDAVIT OF
ASHLEY NICOLE
RODENHEISER**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF VIRGINIA)
 : SS.:
CITY OF NORFOLK)

ASHLEY NICOLE RODENHEISER, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 3802 Flowerfield Road, Apt. C, Norfolk, Virginia 23518.

2. I am currently 24 years old, having been born on March 3, 1998.

3. I am the daughter of Richard Edmund Rodenheiser, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. On December 5, 2017, my father passed away from colon cancer, at the age of 50. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My father was my entire life. We had a special father-daughter relationship. Being the youngest of my sisters, I was only nineteen when my father passed away. Because I looked to my dad as the calmer parent, I relied on him because I could open up and talk to him without him getting mad at me. My dad taught me how to drive and helped me get my license. Even when I

made a few mistakes on the road here and there, my dad was always understanding. We would usually practice driving after he picked me up from work. I used to work long shifts at a pizzeria, from 3 p.m. to 11 p.m.; however, despite working a long day himself, my dad was happy to pick me up and spend time driving. We had some of our best conversations during that time together, and I understood that we truly trusted each other. When I was growing up, people would call me his clone because of all of his children, I looked the most like my father. Aside from some of the personal things a rebellious teenager keeps to herself, I shared everything with my dad. My mom is also a wonderful parent, and I love her, of course; but I miss the compassionate and level-headed space that my dad provided for me to talk and open up.

6. I was only three and a half years old on 9/11, so I don't remember much about it or the terrorist attacks. I later learned that my father was working as an electrician for Con Edison at the time, going into utility holes to repair electrical equipment. He was involved in this type of fieldwork on 9/11. In addition to working for Con Ed, my dad was a volunteer firefighter working on the pile to locate possible survivors. He continued to work in the vicinity of Ground Zero long after 9/11 as part of Con Ed's efforts to reconnect electricity to lower Manhattan.

7. While working at the pizzeria one evening, I received a call from my mother. She was crying when I picked up the phone, and I started to freak out. I asked her what was wrong, and she said my dad might have cancer. I didn't even hear her say that it wasn't definitive, only that it was "cancer." I broke down in front of my manager, and my family came to pick me up so we could all be with my dad.

8. When my dad was admitted to DePaul Medical Center in Virginia, his care was somewhat rocky at first because they provided him with false information as to the location of the cancer. It wasn't until much later that we learned the location and severity of my dad's cancer. He had a procedure to have his stomach drained because the cancer had caused a buildup of fluid. We ultimately moved my dad to the Cancer Treatment Centers of America in Philadelphia. Once he started treatment in Philadelphia, the doctors performed surgery, and he continued on with chemotherapy.

9. When I first heard the news about my dad, I totally broke down. I was in a complete state of shock. Despite how I felt, I could see that my mom was constantly a mess, and I tried to be as strong as possible to keep things together for her. After my dad's surgery in

Philadelphia, I felt somewhat relieved because the doctors told us that they had removed the tumor and that he would continue chemotherapy treatments. Unfortunately, it was harder to maintain my show of strength once my dad's cancer spread. His condition deteriorated, and it was clear that he was becoming weaker and losing a lot of weight. The changes were visible in his face, and his arms had become thin and bony. After my dad's condition had deteriorated further and he had to receive hospice care from a bed in our home, I was saddened to see how much pain he was in daily. He broke down in tears one day when his grandson tripped on the last few steps as he was going downstairs. It was a minor fall, but my dad couldn't get up to help him, even if it had been an emergency. That greatly upset him. My father was always available to my sisters and me, and when I think about how sad he became when he couldn't help my nephew that day, I am heartbroken. The insidious part about my dad's cancer is that as it began to spread to his other organs. His memory and speech were affected as well. Since he couldn't communicate at that point, he would essentially just look at you. The problem is that when he would look at me in silence, I felt as though he might not even know who I was.


10. For most of my life, we've never had the greatest finances. When I was 16, I had my first job and voluntarily started to pay rent to help out because I saw how much my parents were struggling. In addition to my dad's health problems, my mom hadn't worked in a very long time. I remember my dad often working three jobs to make ends meet. Even before learning that my dad was sick, my sister and I would contribute to the household finances. Since my dad was the primary breadwinner, once he could no longer work and after he passed away, it became more difficult to make ends meet. Thankfully, my sister and I were able to work and help support our mom as much as possible. Once my dad passed away and my mom was able to collect some death benefits, I felt more comfortable moving out and having mom be more financially independent.

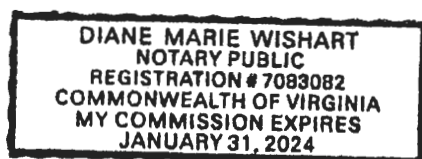
11. My father and I had a special bond that is irreplaceable. I still struggle with his loss on a daily basis. However, what weighs on me is the trauma that my dad's illness and passing away wrought on our entire family. My dad sacrificed everything to support us and give

us the best life that he could. No one should have to suffer in the ways that we all did as a result of my dad's cancer.

 7/12/22
ASHLEY NICOLE RODENHEISER

Sworn to before me this
12 day of July, 2022

 7/12/22
Notary Public



Colleen Marie Rodenheiser

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
SUZANNE ANDERSON, et al.,

**AFFIDAVIT OF
COLLEEN MARIE
RODENHEISER**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.
-----X

STATE OF VIRGINIA)
 : SS.:
CITY OF NORFOLK)

COLLEEN MARIE RODENHEISER, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 1889 Brookwood Road, Norfolk, Virginia 23518.

2. I am currently 50 years old, having been born on December 31, 1971.

3. I am the wife of Richard Edmund Rodenheiser, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. On December 5, 2017, my husband passed away from colon cancer, at age 50. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. Richard and I had a wonderful relationship, and he was a great father to all of our girls. I met Richard after my cousin came over to visit my house one day in 1988. While my cousin and I were watching TV, my cousin had a seizure. We called the volunteer fire department and Richard showed up along with the paramedics. It went on from there and we officially started dating on March 14, 1990. We were always together and talked constantly. All of those early years were incredibly fun. We would go out to movies, and he got me into gaming on the prodigy network, where we played Dungeons & Dragons titles like Out of the Abyss. We got our first place together in 1992 and eventually had three beautiful daughters together. When my daughter, Gabrielle, was just 16, she gave us our first grandson, Hayden. Hayden became Richard's love, and he always referred to him as his "little minion." Now, Hayden misses his grandfather so much, and we talk about him all the time. Since Hayden's brother, Ren, and his sister, Ellie, were born, I try to tell them as much as possible about Richard so that they can know a little bit about who their grandfather was and what he was like.

6. Over the years, we did many things as a happy family. Together, we took our daughters, as well as our grandchildren, to the zoo and many other fun activities. Regularly, we would go out to the movies and for dinner. Even though he was working two to three jobs at once, Richard would always make time for us. I always enjoyed spending time with Richard and have many fond memories of going to the park together, as well as time with the whole family attending Harbor Fest in downtown Norfolk, a great event where all the old sailing ships are in the harbor. Fourth of July celebrations were always a particularly good time to spend together, with my mom visiting sometimes so we could all enjoy. After moving to Virginia, Richard and I made an effort to bring the girls back up to New York when we could so that they could visit with family and old friends. Richard passed away when he was only 50; he was the love of my life and absolutely adored by our daughters. My life hasn't been the same within the last five years since he passed away, and I'm sad that he's missed out on so much since that time.

7. I remember September 11, 2001, like it was just yesterday. First, I dropped off our daughter, Samantha, at her school. At the time, our other daughters, Gabrielle and Ashley, roughly three and four years old at the time, were still at home. I received a call from Richard, who worked for Con Edison at the time, from the yard at East 16th Street. Richard advised me to

watch the news and, after turning on the TV, I saw that the first tower was engulfed in flames. I called my mother-in-law into the room, who was living with us in Centereach, NY. I told my sister that Richard explained that he was probably going to be quite a while getting out of the City because they canceled all work that day and he had already been assigned to work in the World Trade Center area, which was now Ground Zero. Richard was assigned to work on transformer vaults and a manhole, which included the high voltage and low voltage cables. Richard saw things were becoming increasingly chaotic and said he wouldn't be home for a while and that he may have to sleep on the floor in the yard. I told him I loved him and that he better come home. When I got off the phone with Richard, that's when I saw the second tower struck by United Flight 175. I called Samantha's school and was informed that they were on lockdown but that the children are safe. I kept wondering how she is going to understand what's going on. She was only six years old. My other daughters were only three and four years old. Especially for those two, the only thing they would be able to understand was that mommy was crying and upset. Richard didn't return until after seven o'clock that evening, except he was covered in soot and dust. You could see cars and trucks were covered too. Richard wasn't alone either; I saw neighbors coming home with all that crap on them. It was so bad I told Richard to change before coming in the house and to throw away his clothes, even if it meant getting a new uniform from Con Edison.

8. When Richard went into work the next day, all of his assignments were shifted around. That day, Richard was literally right by the pile working out in the manholes because most of the electric power in lower Manhattan was out due to the collapse of 7 World Trade Center. Most people don't realize that Con Edison operated a substation in the sub-basement of that building, resulting in a massive loss of service. As a result, scores of utility crews, including my husband's, were all down there and remained there for over a year. While the utility said the crews would be relocated to midtown, the City of New York insisted they continue work around the World Trade Center. Apparently, the city had asphalted over many of the manholes in the process of making the area accessible to dump trucks. As a result, Con Edison had to dig them out, and my husband assisted in this process, requiring him to continue work in the area over the course of an additional year. The continuing work involved dozens of manholes and transformer

vaults, which needed repair and rewiring. In one instance Richard came home crying, explaining he had thrown up after he and his partner came across a manhole with a body that had been trapped inside. The body they had seen was only from the torso down. Ultimately, his work in that area continued through October 2003. While this was going on, Richard's mother had broken her hip after a nasty fall. She never recovered and passed away in 2003, complicating things further for Richard and his mental health.

9. Around August 9, 2016, Richard received a concerning call from his doctor. The doctor said that Richard's routine bloodwork was very strange because his hemoglobin levels were at a 3, whereas they normally would be over a 15. As a result, the doctor suspected there may be internal bleeding somewhere in his abdomen. We went to the hospital, and they did two blood transfusions. In addition, Richard had an endoscopy, which was clear. However, the next day, August 11, 2016, Richard had a colonoscopy, which led the doctor to find a tumor in his abdomen around 11 x 14 centimeters, which they marked with a tag. The diagnosis was devastating. More frustrating, at the time, a doctor told me that the tumor was on Richard's right side, behind his liver, which turned out to be incorrect. During this process, we encountered a nasty oncology surgeon who kept saying the tumor was on the right side, even though when I reviewed the imaging from the CAT scan, the mass appeared to be on the left side. Clearly, the oncologist confused the left side with the right and upon reviewing the CAT scan again, he said, "it's on the left." Refusing to deal with such a quack, I called the Cancer Treatment Centers of America and made an appointment. We flew up there in the same August and stayed for about three days. The first day was a tour of the hospital to show that their facility offered everything under one roof. Over the next two days, Richard underwent extensive testing because they wanted to confirm everything for themselves, also concluding that the tumor was on the left. I was pleased that they corrected the prior doctor's mistakes. Once Richard became a patient at the Cancer Treatment Centers of America, he was quickly scheduled for surgery in early September. Waiting for Richard to emerge from the surgery was an agonizing experience. What was meant to be a three-hour procedure turned into more than seven hours because the doctor found additional tissue with tumors and needed more time to remove them. They had to take out a lot of his colon and reattach it. After the surgery, Richard was required to stay in the hospital for

about one and a half weeks. Essentially, Richard was discharged after he was able to pass stool, which took time because everything was numb, and his nerves had to reconnect.

10. In November 2016, we flew back up to the Cancer Treatment Centers of America so that they could install a port in Richard for chemotherapy. As soon as he received the port, Richard began chemotherapy the same day. From there, Richard would have to undergo one four-hour chemo treatment every two weeks. This continued through late May of 2017. In addition to the chemo, Richard was prescribed additional pills, which he needed daily, as well as pain medication. Then, in May 2017, Richard underwent further MRI and PET scans, which appeared to show he was in remission. He continued the chemo pills just in case. However, around mid-October 2017, Richard began losing a drastic amount of weight. As a result, we returned to the hospital, at which point additional scans showed that the cancer had returned. Only this time, the cancer had spread to his pancreas, liver, lungs, and his colon. The doctors suggested that we try a dose of immunotherapy and see how that goes. Unfortunately, the immunotherapy was not effective, and they estimated he would only have another five or six weeks. Since he passed away on December 5, 2017, their estimate was more or less correct.

11. Receiving word of my husband's cancer diagnosis, as well as the emotional roller coaster that followed over the course of his treatment, was heartbreaking. Had Richard been able to survive only a couple more years, we would have celebrated our 25th wedding anniversary by renewing our vows. Ultimately, we were together for 27 years and married for 23. We met when I was only 17 years old and knew Richard was my soulmate. At 17, I was a broken girl and Richard put me back together piece by piece. As a family, even though it was an extraordinarily difficult time, I was able to manage things with my young daughters while taking care of Richard's medical needs because I was open and honest with them, and we all understood that we needed to be there for each other for moral support. I'm so proud of my girls and really appreciated how Samantha, Gabrielle, and Ashley stepped up and even flew up a number of times to see their father when he was undergoing treatment. This was especially important at times when I couldn't even get myself out of bed and was sick. A couple of times, it was so difficult for me to confront everything Richard was going through that I started throwing up just knowing that I had to get on that flight. Ultimately, it turned out that my daughters were able to

handle things even better than I could and had a stronger stomach to deal with my husband's painful condition. Administering substantive medical care to my husband was an extremely painful process for me to have to endure. It was hard to oversee treatments for something that was so painful for him. Toward the end of Richard's life, he developed acute ascites. As a result, he needed a tube in his abdomen so that we could drain his stomach, which usually meant relieving him of one to two liters of fluid every night. Sometimes, I would do the draining, other times, my daughters, Samantha, Gabrielle, and Ashley helped. More toward the end, it was hard for Richard to get out of the hospital bed to wash up, so I would help him as best I could. I also wound up taking him to the bathroom a couple of times, which failed, so we had a bedside toilet set up. Taking care of someone with cancer can be truly unbearable at times. I've had to do this way too many times already, first with my stepfather, then my grandmother, my girlfriend's mother, and finally I had to take care of my husband.

12. Despite having good health coverage, copayments and coinsurance costs created a big impact on the family financially. Even before Richard became ill and we incurred all the extra costs of copayments and travel expenses for Richard's various treatments, my family and I were already experiencing significant financial troubles stemming from a series of moves. When my daughters were born, we were living in Queens, NY. Later, we purchased the house in Centereach, NY. Unfortunately, after Richard was laid off from Con Edison, we fell behind on the mortgage payments and the home was foreclosed upon after the bank declined to modify our loan. Con Edison had laid off hires with 15 or more years of experience in order to bring on younger workers at a lower rate. Since we lost the home in Long Island, our family moved to Virginia and stayed at my father's house for a time. From there, we had a couple more moves before settling on a place. We had a small apartment and from there, another apartment on Woodall Road, where we were living when Richard passed away. Richard did not want to die in a hospital, so we had set up the hospice bed in our living room. After he passed away, I couldn't stay in the same house. So, I moved to my current home on Brookwood Road, and my daughters soon moved out to their own places.

13. Richard was so priceless to all of us, and he never should have died. My husband was my soulmate. While no amount of money is ever going to bring him back, it's important for

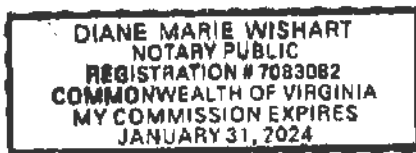
the court to understand that this December it will be five years since Richard passed away, and I'm still facing unbearable pain from losing my husband and best friend. I don't know where the time went but I know that the life I enjoyed before is gone and will never be the same again without Richard.

Colleen M Rodenheiser
COLLEEN MARIE RODENHEISER

July 12th
2022

Sworn to before me this
12 day of July, 2022

Diane M Wishart 7/12/22
Notary Public



Samantha Joanne Rodenheiser

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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SUZANNE ANDERSON, et al.,

**AFFIDAVIT OF
SAMANTHA JOANNE
RODENHEISER**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN.

Defendant.

-----X
STATE OF TENNESSEE)
 : SS.:
COUNTY OF MORGAN)

SAMANTHA JOANNE RODENHEISER, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 102 Flat Rock Road, Deer Lodge, Tennessee 37726.

2. I am currently 28 years old, having been born on April 15, 1994.

3. I am the daughter of Richard Edmund Rodenheiser, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. On December 5, 2017, my father passed away from colon cancer, at the age of 50. It was medically determined by the World Trade Center Health Program that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My dad was definitely my best friend in every way. As my father, I would go to him first if I was ever in trouble. Whenever I made a mistake, such as the time he caught me smoking a cigarette, he was always understanding and rather than blowing up, he just calmly told

me to stop. Dad was always there for my sisters and me as we went through school. Really, the most profound image I have of my dad is that of a provider. He would work two to three jobs at a time and would always use part of his free time to work extra hours. Individually, my dad would take my sisters and me to the shooting range, and he would teach us about firearms and marksmanship. Dad was a master at arranging family gatherings and keeping the family together. The last four years since my dad passed away have been pretty, pretty crappy. The first few months after my dad passed away, our family had a number of birthdays that were back-to-back, December, January, February, March and April. It was really painful that we felt his absence so many times that were so close to each other. To make matters worse, during the same period, my sister, Gabrielle, announced she was expecting another child, and we were sad that our dad wouldn't be around to meet his new grandchild. It was also difficult because during the time my dad's condition became more severe. I was having some personal issues develop with my relationships. My dad was always there for me; however, it was upsetting not having him here for guidance at a time when I really needed it most.

6. On September 11, 2001, I was living on Long Island and was a student at the Jericho Elementary School in the 2nd grade. I recall the teachers at school reacting anxiously to the news of the terror attacks as they began to receive phone calls. Within 15-20 minutes, the school went into lockdown mode. Then, my teacher, informed the class about the attacks, explaining that she understands many of us had parents or other family members in the city and that we would be dismissed in an orderly fashion. I remember the feeling of worry for my father, knowing he was working in the city. In fact, my dad had completed an overnight shift in the City for Con Edison, and we were all worried about him. My mother rushed out to Jericho to pick me up and waited outside the school until the lockdown was lifted. When we arrived home, my mom, my two sisters, my dad's mom, and I sat in the mother-in-law suite of our Long Island home, just watching the news unfold on TV, waiting for my dad to walk through the door. We had lost contact with him for a while. When he finally returned home, I felt like a piece of me had been puzzled back together because I can see that he was okay. He continued working in the city post 9/11 for quite some time as a result of his work for Con Edison. Later, as my dad became progressively more ill, he would experience PTSD episodes related to 9/11 as a result of the things he saw as he would go through the rubble. One time, he actually called me the name of

one of his coworkers from that time and reported that he found something while he was cleaning out the manholes. Dad continued to work there through much of 2002. Later, following a back injury, he was let go from the company and then started to work security at the Smith Haven mall.

7. I learned about my father's cancer diagnosis sometime around August of 2016. At the time, I was working as a bartender and was getting ready to leave for work when my sister Gabrielle called and informed me that dad was diagnosed with cancer. From there, we all met up at the hospital to visit my dad. The doctors created a lot of miscommunications right off the bat and explained that my dad's hemoglobin levels had dropped drastically and that they detected some internal bleeding. As I listened to more medical jargon than I ever would have wanted to hear, I began to disassociate because the whole situation felt like a total nightmare from which I couldn't awake. About one month after the diagnosis, my parents went to Pennsylvania for a second opinion. They were informed that the tumor was substantially larger than what DePaul Medical Center had said it was, finding that it had taken over the entire right side of his colon and that it had been growing for many years. My sisters, my mom, and I worked as a team to take care of my dad. Since I worked as a bartender, my job was somewhat lenient in terms of time-off, and I was able to take turns with my sister visiting dad at the Cancer center in Philadelphia. Dad had a tube connected to his stomach, which had to be drained. My family generally helped dad with the tube more than I did because I tried to do it once, barely wiggling the tube, and after seeing my dad wince in pain I couldn't do it anymore.

8. As a result of the loss of my dad, as well as other pressures in my life, I recently started therapy. Out of all the traumatic experiences in my life so far, losing my father, when I was only 23 years old, was the worst. Currently, I have never been married and haven't had any children; however, I feel awful that my dad won't be there to walk me down the aisle or, when I have children, to meet my kids. I'm also especially sad that my dad wasn't able to meet my boyfriend because he's a lot like my dad and they share so many common interests. My dad loved cars, trucks, and motorcycles, and my boyfriend is also a motorcycle enthusiast and owns two trucks. They both have a blue-collar background, and my boyfriend is in construction. I recently returned from a trip to meet his family in Tennessee, and it really made me wish that my dad was here to see how happy I am for the first time in quite a few years. After my dad passed

away, I dealt with a number of experiences where I really could have used my dad's guidance and comforting words. First, I had two really bad relationships and then, in 2020, I had a miscarriage. Not having my dad here to help me through the difficult times or even see me work through those painful ordeals and find happiness is truly heartbreaking. If there was ever such a thing as time travel, my dad would be the first person I would visit and warn him of the future impact exposure to 9/11 toxins would have on his health. As a result of the terrible effect this had on my family, it's very possible he would have listened.


9. In addition to the emotional pain, after my dad was diagnosed with cancer, everybody's financial situation declined substantially. We were keeping our heads above water but clearly struggling because we alternated turns taking time off from work. In order to support dad when he would go for chemotherapy treatment, or undergo treatment in Philadelphia, we would take turns taking off from work. This had a ripple effect anytime my sister's work schedule changed and I, or another family member, would need to watch my nephew. During the period from approximately October 2016 through May 2017, I took off a number of days off to help out with my dad while he was undergoing chemotherapy. Collectively, we all lost many hours towards our paychecks. The summer of 2017 presented the most difficult challenges because dad experienced numerous emergency events, including hypothermic shock, making it virtually impossible for any of us to provide notice to an employer regarding time to assist the family. During this period, I lost my job and even had a boss who told me she didn't care who was dying of cancer. While my dad was dying, my family was contacted by creditors as his medical bills piled up. Even months after he had already passed away, we would still get harassed by collectors.

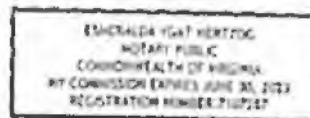
10. Had my father beat the cancer and were still alive today, I have no doubt he would be working tirelessly as an advocate for the 9/11 community. After sharing my family's experience with others afflicted from the impact of the 9/11 attacks, I'm inspired by the work of activists like John Feal, whose foundation assists first responders to connect with critical resources. After meeting John and other activists, I have no doubt that my dad would want to be similarly involved and would absolutely support actions like this case intended to hold everyone responsible for the tragedy of 9/11 to account. Living and working in Virginia, I find myself explaining to people routinely that the reason my dad developed cancer was strictly due to his

exposure to 9/11 toxins, which caused a tumor in him to grow unnoticed for years after 9/11. Even though it's painful to have to explain what happened to my dad to people, I'm glad to tell my story because I recognize how many other families have been impacted by 9/11-related illnesses. I sincerely appreciate the court's consideration.


SAMANTHA JOANNE RODENHEISER

Sworn to before me this
11 day of July, 2022


Notary Public



Gabrielle Paige Yamashita

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
SUZZANNE ANDERSON, et al.,

**AFFIDAVIT OF
GABRIELLE PAIGE
YAMASHITA**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF VIRGINIA)
 : SS.:
CITY OF NORFOLK)

GABRIELLE PAIGE YAMASHITA, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 7857 Woodall Road, Norfolk, Virginia 23518.

2. I am currently 25 years old, having been born on February 19, 1997.

3. I am the daughter of Richard Edmund Rodenheiser, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. On December 5, 2017, my father passed away from colon cancer, at the age of 50. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My dad was a 100% active father all the time. This was especially true in the years before his passing, even though he greatly suffered. My dad was the one who taught me how to drive and encouraged me in everything I did. Although we were very close, I am particularly grateful that my dad was able to spend time with my son. I had my first son a few

weeks shy of my 17th birthday. My dad was so proud to become a grandfather, and he was wonderful at it. When I became a licensed cosmetologist and worked in a salon, my dad trusted me to cut his hair on a regular basis, which afforded us another opportunity to spend time together. Even though my dad worked two jobs in my preteen years, he spent whatever time he could with me and my siblings. He was an extremely resourceful man who worked so hard to take care of his family. His strong work ethic inspired me to push myself to take care of my own family, something I still do to this day. I attribute much of my drive and capability to support my family to my dad and all of the life lessons he taught me. In early 2016, before my second pregnancy, I had aspired to become a police officer. In preparation for becoming an officer, I would go to target practice and shoot with my dad up until he wasn't physically able to continue to do so. After my dad passed away, I discovered I was pregnant with my second son and decided not to pursue the police force.

6. On 9/11, my father worked as an electrician for Con Edison. Our family lived on Long Island, and my dad commuted into the city each day for work. He was usually assigned to repair power cables and equipment underground as needed. In addition to working for Con Ed, my father was a volunteer firefighter. He volunteered in that capacity at ground zero and was actively digging through the rubble to locate survivors. He continued to work with the utility company around the World Trade Center site for two years after 9/11, reconnecting electricity to all of lower Manhattan.

7. Our family moved to Virginia in around 2010. The move was prompted because our home was foreclosed upon after my dad lost his job following a work-related injury.

8. My dad was always very healthy and took good care of himself. After a routine exam, his doctor called him while he was at work and explained that his bloodwork indicated some areas of concern. My dad left work that day and went to the hospital. A further blood test was conducted, and he was admitted for minor internal bleeding. In the summer of 2016, while in the hospital, my dad received an endoscopy and a colonoscopy, which revealed that he had colon cancer. Prior to his diagnosis, we had no prior indication whatsoever that my dad had any health issues. I remember learning of the diagnosis when my mom called me while I was working at the salon. When I spoke to my mom in the salon's private office, she broke the news to me, and I started to cry. Since I was the first to know, I called my sisters to break the news. It

was a heartbreaking thing to do. My whole family, including my husband and son, went to the hospital to be with my dad.


9. A few months after the diagnosis, in the fall of 2016, my dad underwent surgery to remove a substantial portion of his colon at the Cancer Treatment Centers of America in Philadelphia. Following the surgery, he remained there for a few days. My sisters, my son, and I drove up to Philadelphia to surprise him because my mom reported that he was feeling very depressed. The doctors were optimistic at that time, and within a few days, we were able to take him home. Soon afterward, my dad started chemotherapy, and my sisters and I would take turns being with my dad during the chemo to give my mom a little break. Unfortunately, the chemotherapy seemed to be hurting more than it was helping. After about six rounds of chemotherapy, the doctors conducted a further scan, which showed that the cancer was still in his lymph nodes. This led to adjusting my dad's treatment to immunotherapy. However, after just one round of immunotherapy, my dad was so weakened that he could barely walk into the front door. The cancer was also causing fluid to accumulate in his stomach, which needed to be drained. Over the course of fifteen months, it was extremely painful to watch my dad deteriorate.

10. From the start of my dad's diagnosis, even until now, it has been an awful and painful experience dealing with his illness and all its ramifications. While in the beginning, and even after my father's surgery, I tried to remain optimistic, it became extremely difficult to witness my dad suffer. It was quite overwhelming when my father was battling cancer because I had my own family to take care of while simultaneously trying to be supportive of my parents as they underwent the most traumatic experience of their lives. I felt stressed being the lone voice of optimism and encouragement at a time when my mom was surrounded by people and doctors trying to prepare her for the worst. To create a visual of the emotional impact that my father's cancer had on my life, imagine my life as a giant *Jenga* tower and somebody coming along and flicking out the bottom of the tower. All the pieces came tumbling down, and I've been picking up the pieces ever since. Losing my dad left me with a trauma that still lingers.

11. After my dad was diagnosed, there were significant financial impacts on the whole family because he was the primary breadwinner. None of us made much money, but we contributed to help my mother as much as possible. Financially, it's still difficult to this day, but I mostly worry about my mom since she was reliant on my father to take care of her for so many

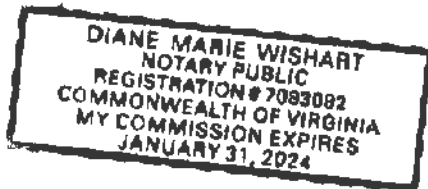
years before he was diagnosed.

12. One of the most difficult things about losing my father at such a young age is the fact that he was never able to meet two of my children. My oldest child, Hayden, only knew his grandfather for the first few years of his life. Hayden is still hurt by the loss of his grandfather because he remembers him and wishes that he could have had more memories with his "Papa," as he affectionately called my dad. I think it's extra hard for me knowing that my younger children won't have the benefit of a loving and caring grandfather. He would have been so proud to see them grow up. My husband, who lost his father at a very young age, became very close to my dad, who was akin to a surrogate father for him. He was also deeply impacted by the loss of my dad. My father's loss affected us all. We will never get him back, but his memory stays with us every day.


GABRIELLE PAIGE YAMASHITA
7/12/22

Sworn to before me this
13 day of July, 2022

 7/12/22
Notary Public



Jason Rolon

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

SUZZANNE ANDERSON, et al.,

**AFFIDAVIT OF
JASON ROLON**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)

: SS.:

COUNTY OF RICHMOND)

JASON ROLON, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 732 Correll Avenue, Staten Island, New York 10309.

2. I am currently 47 years old, having been born on January 29, 1975.

3. I am the son of Robert Rolon, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. On August 4, 2015, my father died from Acute Lymphoblastic Leukemia. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My dad worked as a doorman on Park Avenue for many years. Around 2004, my dad retired and moved to Florida. This created some distance between us, but we still had a great relationship and would talk on the phone on a regular basis. When I would visit my dad in Florida, we often would go fishing. When I was younger, dad would arrange for us to go camping and fishing and encouraged us to bike as much as possible. I feel that dad was always

there when we needed him. He was a gentle soul and also very quiet and humble. Probably, most of all, my dad liked to fish, and whenever I would visit him in Florida, dad would often spend the whole day fishing on a boat or a pier. What I miss the most about my dad is not having the opportunity to share what's going on in my life and him not knowing all that my sister and I have accomplished.

6. On the day of the 9/11 attacks, my father was on vacation in Florida. After he returned from his trip, he continued to live on the 14th floor of his building at 310 Greenwich Street, just blocks from ground zero. Since there was a smoldering fire pit burning nearby my father's home after the attacks, he could smell it in the air all the time. While the Red Cross provided a small air purifier, it wasn't very effective at making the environment much safer. At the time, it was difficult to assess the severity of the toxicity of all the fire and smoke emanating from the World Trade Center rubble.

7. My father did not have any serious health issues through the years. However, on New Year's Eve of 2014 (going into 2015), he called me to tell me that he was in the hospital. A few days later, we learned that he had leukemia. Since I lived in New York and dad was in Florida, it was difficult to have a complete understanding of the diagnosis. However, upon speaking with his doctors, I learned more and more as my dad's cancer progressed. After talking to his doctors, I would call my sister to relay the information I learned about my dad's health. That was quite stressful. One of the toughest things I ever had to do was to encourage my dad to live and be as strong as possible when I knew that he really didn't have much longer to live. I tried to visit my dad in Florida as often as I could, but it was difficult because I'd have to fly. I often felt terrible guilt that I couldn't be there for him on a daily basis.

8. After my dad was diagnosed with cancer, he did receive a couple of chemotherapy treatments, mostly in the form of blood transfusions. Ultimately, the blood transfusions made my dad feel much better and placed him in better spirits. His doctor explained, however, that chronic blood transfusions is not a practical way to live. Sadly, no further treatment options were presented, and the doctor told us that my dad would need to go into hospice care. In July 2015, my father was barely capable of speaking. We had to accept that his cancer was worsening, and he didn't have much longer to live. It was devastating to have to come to that realization. He was released from hospice on August 3rd and wasn't even home for

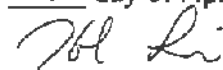
24 hours before passing away. He was staying at his girlfriend's house at that time because she was providing much of his care. On August 4th, he woke up briefly at 9:00 a.m. and then passed away peacefully.

9. Throughout my dad's cancer, I tried to be a strong-minded person. I know in life it's inevitable that our parents or loved ones are going to pass at some point in time. However, for my dad, passing away in the manner that he did felt like he was cheated. For me, I experienced a lot of hurt and confusion but also feelings of tremendous guilt, thinking I could have done things differently in terms of my father's care. This was truly an emotional roller coaster, especially knowing that at any moment you could receive a call that your father has passed away. At the end of the day, my sister and I tried to have my dad return to New York so he could be closer to us, but he didn't want to become a burden. Suddenly, as my dad's condition worsened, I could feel our roles reversing. It was now up to his children to take care of him instead of the other way around. Anytime the subject of my father's condition is brought up, I become very emotional.

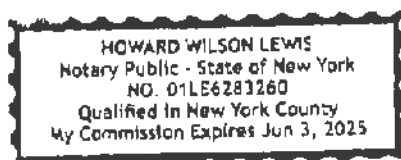
10. It is so unfair the way that my father died. Just living his life in his own home caused him to become ill. That's not natural at all. My dad's illness and passing away created so much unnecessary hurt. I miss him dearly. I wish he was still with us. I am certain that but for his cancer, he would still be here today enjoying his retirement and spending time with his loving family.


JASON ROLON

Sworn to before me this
29 day of April, 2022



Notary Public



Lisa Sonitis

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
SUZANNE ANDERSON, et al.,

**AFFIDAVIT OF
LISA SONITIS**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.
-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF RICHMOND)

LISA SONITIS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 75 Pheasant Lane, Staten Island, New York 10309.

2. I am currently 49 years old, having been born on November 13, 1972.

3. I am the daughter of Robert Rolon, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. On August 4, 2015, my father died from Acute Lymphoblastic Leukemia. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My dad was a model father going back all the way to when we were kids. He always made time for us and planned fun things for us to do, like family vacations. Since my father loved the outdoors, camping and fishing were a focus on most of those trips. That was just his thing. My dad's parents lived in Florida, so when we were kids, we would often visit my grandparents, and my dad would take us to Disney World. I loved those trips. My dad was also an amazing grandfather to my two children. He loved them so much and planned to teach them all of the outdoor activities he enjoyed. After my dad moved to Florida, he would travel back to

New York for Thanksgiving, where I continue to host the family today. Anytime he would visit New York, he would make special plans to spend time together with me, my brother, and his grandchildren. My father was a gentle, quiet guy. Aside from the time spent with his family, he was happiest being by the water, fishing off a pier.

6. My father lived at 310 Greenwich Street, just blocks from the World Trade Center. On September 11, 2001, he was in Florida. Following the attacks, he was unable to return to his home for two weeks due to the chaos and damage surrounding the World Trade Center site. After the two weeks, the tenants were told that it was safe to move back into the building. He had a birds' eye view of the rubble from his terrace and would document through photography the changed landscape and the cleanup efforts. He wanted to use these photographs to not only record history, but to someday teach his grandchildren about what happened on 9/11 and how it changed the world. He also wanted to document the time because I was due to have my first child in June 2001, and my dad wanted her to see what was happening when she was born. My dad continued to reside in that same apartment for about four years after 9/11. He worked as a doorman on Park Avenue and returned to his apartment in the evenings.


7. I learned of my father's health problems right after Thanksgiving in 2014. Like most Thanksgiving holidays in prior years, he came up to my place in New York to visit. I had no idea that it would be his last Thanksgiving with us. At the end of December 2014, my dad went to the hospital. He didn't tell us right away because he didn't want us to worry. After all, he was in Florida and we were in New York, so we couldn't get to him right away. He was admitted to the hospital and had to stay there for quite some time. They performed many tests and were trying to find out why he was so sick. That's when he finally called my brother. He was ultimately diagnosed with leukemia. It was a shock to all of us.

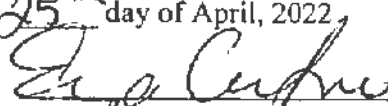
8. Upon finding out about my father's diagnosis, I did some research about leukemia. I learned that ALL (Acute Lymphoblastic Leukemia), the type he had, is much more serious in adults than in children. I knew that, even if he was going to undergo chemotherapy, the outcome was not going to be good. My dad's diagnosis was so distressing for me because I worried about how I could possibly take care of him when he was so far away. I knew it would be difficult because I had two young daughters and travel to and from Florida would be a challenge. My girls were only nine and thirteen at the time my father was diagnosed. I was

finally able to visit my father in February 2015, while my girls were on winter recess. We planned to see my father at his home, but he had to be admitted to a hospital in Gainesville, Florida, so plans had to quickly change so we could be closer to where my father was. It has heartbreaking to see my father so sick. After he was released from the hospital, he began a course of chemotherapy treatments, which made him really sick and uncomfortable. After a few months, the chemotherapy stopped, and my father started blood transfusions.

9. After my father's treatments started, it was very painful to see him having difficulty doing the activities he used to enjoy so much. Sometimes walking, even short distances, were problematic because my father would have difficulty breathing. With the hot weather in Florida, just walking to the end of the pier was hard, and it was impossible for him to keep up with the grandchildren like he used to do. He would usually have an outing for the whole day, but due to his illness he was now winded after about 45 minutes.

10. As a father and a grandfather, my father has missed out on so much that I know he would have loved. My daughters, Athena and Chloe, deeply miss having their grandpa at their special events, including Athena's high school graduation and soon Chloe's graduation. I know if he were alive today, he would be so proud to see his grandchildren being accepted into college and learning how to drive a car. My daughters always remember their grandfather every time they have a birthday. They recall how he always remembered their birthday and would send them stickers in the mail. They were so excited to receive mail from him and would run out to the mailbox each time. Sadly, I remember my youngest going to the mailbox on her birthday in April 2015 and thinking it would probably be the last time she receives the birthday letter from her grandfather, and sadly it was. We will forever remember my dad for the loving father and grandfather he was, and we will continue to miss him being with us.


LISA SONITIS

Sworn to before me this
25th day of April, 2022

Notary Public



Jacob Rozenberg

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
SUZZANNE ANDERSON, et al.,

**AFFIDAVIT OF
JACOB ROZENBERG**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.
-----X

STATE OF NEW YORK)

: SS.:

COUNTY OF KINGS)

JACOB ROZENBERG, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 2006 Avenue V, Apt. 8A, Brooklyn, New York 11229.

2. I am currently 36 years old, having been born on October 5, 1985.

3. I am the son of Boris Rozenberg, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from pulmonary fibrosis on September 26, 2007, at the age of 61. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. I was very close to my father, as I was an only child. We did lots of activities together. In my first year at NYU, I was studying electrical engineering. A big portion of that coursework was in computer science, so my father helped me with my schoolwork. We went on vacation together and went fishing together. We rollerbladed together. My father gave me good guidance in life. He always encouraged me to put in 100% effort to any endeavor. He taught me

to be a man of my word. He shaped my morals and taught me to be there for my friends and family. My dad always motivated everyone in our family. He encouraged my mother to take the NYC civil service exam, and she ended up getting a job with the Department of Health which she still has today.

6. My father was in charge of software for the NYPD. On September 11, 2001, my father was at work at 1 Police Plaza in lower Manhattan. He and my mother both worked near Ground Zero and were present on the day of the attacks. When they were ordered to return to their respective offices, my mom said, "I don't care if they fire me, I won't go back until that smoke clears." She didn't go to work for two months. But my father had no choice. He had to return to the office. So, my dad returned two or three days after 9/11 to 1 Police Plaza. He breathed in all that dust day after day.

7. In 2002 or 2003, my father was diagnosed with pulmonary fibrosis. I was in eleventh or twelfth grade at the time. He took prednisone to suppress his immune system. In 2004, he had viral pneumonia and was admitted to the hospital because it started to get so bad. I remember that, when my dad was in the hospital with pneumonia, my mother overheard the doctors saying they were waiting for my father to die so they could take his organs for donation. My mother called the NYPD, who came to the hospital and demanded that they treat my father's pneumonia. He barely made it out of the hospital.


8. He went back to work with a small oxygen tank in 2005 and 2006. One day, he was very, very sick at work. He called me and said the police had to drive him home to Bensonhurst where he lived. His immune system was very weak, even a flu could have killed him. He was on so many medications. I don't think they were all necessary. Toward the end of his life, my father was on the list for a lung transplant. He was number three or four on the lung transplant list before he died. He almost got it, but he didn't.

9. I was a student at NYU at the time my dad was diagnosed, and I had to take time off from school to take care of my father and later to grieve his death. We didn't have a home attendant, so my mother and I would take care of him. My mom had to also take time off work to care for my dad. He would tell me, "Don't sit at home and be depressed. Go be with your friends." But I wanted to stay with my father because I knew he was dying. I would watch movies with him. I would help him around the house, because he had trouble walking. His

blood oxygen level was 88. But we were hopeful. Even when he had to take the Jewish volunteer ambulance with no air conditioning, he still had a good sense of humor about it. We were always joking and hopeful that the lung transplant was going to happen.

10. It was a very stressful time. Pulmonary fibrosis is a terminal illness—it only gets worse. I felt powerless to help my father. I didn't do well in school because I was stressed about my father's illness. It took me five and a half years to graduate from college. It was a hard and stressful time in my life. I'm still angry that my father wasn't able to get a lung transplant.

11. I wish my father was here to have seen me graduate college and become the person I am today. I wish my father was here to yell at me more. He had a great sense of humor, a critical sense of humor. I remember before 9/11, he and I were cleaning out my great aunt's apartment in the Bronx after she died. He told me, "You should just start cleaning all the stuff out of my apartment now, because I'll be gone soon." It was funny at the time but it's sad because I now realize how little time with him that I had left.


JACOB ROZENBERG

Sworn to before me this
4th day of July, 2022
August


Notary Public



Nicole Marie Casara

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
SUZZANNE ANDERSON, et al,

Plaintiffs,

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF ERIE)

**AFFIDAVIT OF
NICOLE MARIE CASARSA**

20-CV-00354 (GBD)(SN)

NICOLE MARIE CASARSA, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 567 Richmond Avenue, Buffalo, New York 14222.

2. I am currently 42 years old, having been born on January 5, 1980.

3. I am the daughter of Colin Michael Sargent, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from metastatic esophageal cancer on June 25, 2014. It has been medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My father was involved in every aspect of my life, every day of my life. One of the more poignant examples was that my dad coached both my tennis and softball teams. We either saw

each other or spoke on the phone daily. He was my mentor and my friend. My dad was the glue that held our family together. Family was very important to him. A Sargent Family holiday was a big deal. I can't remember a Christmas or Easter holiday that we weren't together.

6. At the time of 9/11, my father worked for OSHA. He volunteered to go down to Ground Zero because he was worried that the first responders wouldn't be able to take necessary safety precautions. It's a heartbreaking irony that he died from the very thing he was trying to make sure wasn't happening to other people. Prior to his job at OSHA, my dad was an iron worker. He knew the risks involved with an unsafe workplace or unprotected workers.

7. Weeks before my father was diagnosed with Stage IV cancer, I had found out I was pregnant with my first child. It was so early, I hadn't even told my dad, yet. I had all this hope and excitement that I wanted to share with him. My dad went to the hospital one day because he was having a lot of aches and pains and didn't feel right. The doctors and nurses were doing tests on my dad, and I could tell from the looks they were giving each other that something was wrong.

8. Eventually, he was diagnosed with Stage IV esophageal cancer. At Christmas, I told him I was pregnant. My dad was elated for me, but it was a very difficult pregnancy, mentally and emotionally. I couldn't enjoy being pregnant when my whole focus was on my dad and taking care of him. I had a little bit of a medical background and was better able to converse with the doctors and nurses than my other family members. I wanted to help as much as I could but going to every single medical appointment with different specialists and oncologists, going from one hospital to the next, while being pregnant, was an unimaginably stressful on me.

9. I had so many sleepless nights after my dad was diagnosed. I was on the phone with him all the time. He really did rely on me a great deal. If it were any other time in my life, I wouldn't

give it a second thought and my main focus was on my dad. But, instead of reading "What to Expect When You're Expecting," I was reading about treatment options for my dad's cancer, trying to find clinical trials. I was reading about what to expect when your father is dying of cancer.

10. My dad didn't want to give up. He was realistic about his prognosis, but he wanted to fight for as long as he could. I would wake up every night and start sobbing because I didn't want my dad to see me upset. I couldn't shake the feeling of loss that had already started to set in. That was my day-to-day life. It was such an unstable time for my family. My father passed away on my daughter's due date. I held off giving birth as long as I could because I wanted to be at my father's wake and funeral. She's seven years old now, and she's a blessing. I don't know if I could handle being pregnant again. The emotional impact of losing my father while carrying my child, the two will always be connected.


NICOLE MARIE CASARSA

Sworn to before me this
13 day of July, 2022


Notary Public

CHERI L. SHEEHAN
Notary Public, State of New York
Qualified in Erie County
Reg. No. 01SH6044979
My Commission Expires 7/17/2022

Kelly Maureen Migliaccio

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

03-MDL-1570 (GBD)(SN)

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

-----X
SUZZANNE ANDERSON, et al,

**AFFIDAVIT OF
KELLY MAUREEN
MIGLIACCIO**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF ERIE)

KELLY MAUREEN MIGLIACCIO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside 61 Parkside Avenue, Hamburg, New York, 14075.

2. I am currently 45 years old, having been born on January 3, 1977.

3. I am the daughter of Colin Michael Sargent, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from metastatic esophageal cancer on June 25, 2014. It has been medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001. terrorist attacks.

5. My dad and I were very close. He's the reason why I decided to buy a house just a block away from my parents' home. He was my confidante and the North Star of my family. He was very close with my kids, especially my oldest daughter. She was his first grandchild, and they shared the same birthday. I saw him almost every day, and we spoke by phone daily.

6. At the time of 9/11, my father worked as a compliance officer for OSHA and volunteered to go to Ground Zero. As a compliance officer, he would investigate accidental fatalities or injuries that occurred on a worksite. He went downtown to try and determine whether the area was safe for recovery efforts.

7. My dad called me one day to say he wasn't feeling well. He felt like he had the flu. My mom was out of town. I was teaching that day, and he asked me to leave work early and take him to the hospital. I took him to the hospital, but as soon as I saw him, I had a terrible feeling it was something bigger than the flu. I could see he was in pain, but that he was trying to hide it. The next day, the doctors confirmed that my father had esophageal cancer and it had already spread. This was in November of 2013. He deteriorated very quickly. He wasn't responding well to the chemotherapy or radiation treatments. By January 2014, he was already suffering. He couldn't walk. He was extremely fatigued. He was involved in some experimental clinical trials. But he went downhill very rapidly.

8. At the time, his diagnosis and illness were very much a blur. The emotional impact of his illness was very difficult on me. I was trying to process it myself, but also trying to navigate how to tell my daughters about the situation. I have four daughters. My father was very close with my girls, and they were very young at the time. When my father died, my oldest was 6 years old and the baby was just a year old. We didn't want the girls to see him if he was having a particularly bad day. We tried for them only to see him on "up" days. They didn't understand what was going


on. My younger sister was struggling with alcohol, and my parents were already at odds about how to handle her situation. I think my dad had a sense of urgency that he wanted my sister to get better while he was alive. So, her drinking was its own drama and it made it easier for all of us not to acknowledge how sick my father was.

9. We weren't talking about his illness or having the conversations we should have been having—about how he wanted things handled after he died or trying to get any closure. My dad wrote a letter to me, toward the end. He was already very weak, and the handwriting was difficult to read. I could tell he wanted us to try and keep the family together. For us to continue to live close to one another. He was really just sad to know that everything was going to be coming to an end for him so quickly.

10. The impact of my father's death on our family runs very deep, to this day. We're not the same family that we were. He was the glue that kept us all bonded. He was our moral compass. He is greatly missed by everyone who knew him.


KELLY MAUREEN MIGLIACCIO

Sworn to before me this
13 day of July, 2022


Notary Public

NANCY A. VANDERBUSH
Notary Public, State of New York
Qualified in Erie County
Reg. No. 01VA6299691
*My Commission Expires 3/1/2026